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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 CHAD BETTS,
11 Plaintiff,
12 vs.
13 CLARITY SERVICES, INC., EXPERIAN
14 INFORMATION SOLUTIONS, INC., FAY
15 SERVICING, LLC,
16 Defendants.

Case No.: 2:22-cv-02162-JCM-EJY

**JOINT MOTION TO EXTEND
DEADLINE TO RESPOND TO
PLAINTIFF'S FIRST AMENDED
COMPLAINT (SECOND REQUEST)**

17 Plaintiff, Chad Betts (“Plaintiff”), and Defendant, Fay Servicing, LLC (“Defendant”)
18 (collectively “Parties”), by and through their counsel of record, hereby stipulate and agree as
19 follows:

20 On January 18, 2023, Plaintiff filed his First Amended Complaint [ECF No. 4]. Defendant
21 was served with Plaintiff’s First Amended Complaint on January 23, 2023. The deadline for
22 Defendant to respond to Plaintiff’s First Amended Complaint is February 13, 2023. On January
23 26, 2023, this Court entered an Order extending the deadline to respond to the First Amended
24 Complaint to March 15, 2023 [ECF No.9].

25 WHEREAS, the Parties hereby stipulate and agree to extend the deadline for Defendant to
26 file its responsive pleading to Plaintiff’s First Amended Complaint to April 14, 2023.

27 This is the second motion for an extension of time for Defendant to file its responsive
28 pleading. The extension is requested in good faith and is not for purposes of delay or prejudice to

1 any other party.

2 As part of this motion, Defendant agrees to participate in any Rule 26(f) conference that
3 occurs during the pendency of this extension.

4 DATED this 15th day of March, 2023.

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6 WRIGHT, FINLAY & ZAK, LLP

FREEDOM LAW FIRM

7 /s/ Ramir M. Hernandez

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18 IT IS SO ORDERED:

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20 UNITED STATES MAGISTRATE JUDGE

21 DATED: March 15, 2023

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